

Ideal Aviation  
James A. Moseley  
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Sauget IL, 62206  
Chief Flight Instructor (Fixed Wing)  
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15 Jan, 2022

To Whom it May Concern:

**Purpose:**

I humbly and respectfully request your consideration for exemption from Section 141.35 (d) (1) of the Federal Aviation Regulations (FAR). This exemption, if granted, would permit me to serve as the Chief Flight Instructor Pilot over a commercial course.

This request is specifically for 14 CFR 141.35 (d) (1) and no others as I already serve as the Chief Instructor Pilot for our approved Private Pilot and Instrument courses.

**Information for your consideration of my petition for exemption:**

- **My contact information:**

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jim.moseley@idealaviationstl.com  
FAA Certificate number 3797504 (Commercial SE/ME, CFII, MEI, AGI)

- **The specific section or sections of Title 14 of the Code of Federal Regulations (CFR) from which you seek an exemption...**

This request is specifically for 14 CFR 141.35 (d) (1) and no others as I already am or qualify as the Chief Instructor Pilot for all other courses taught at Ideal Aviation except those contained in this section.

- **The extent of relief you seek and the reason you seek the relief...**

**The extent of relief sought..**

This exemption, if granted, would permit me to serve as the Chief Flight Instructor over a part 141 commercial course at Ideal Aviation, administering a course of training other than those that leading to the issuance of a commercial certificate or rating, without the required minimum of 2,000 hours as PIC. No additional relief is sought, and this exemption would only apply to my serving as Chief Flight Instructor with Ideal Aviation.

**The reason relief is sought...**

Ideal Aviation currently has a great working relationship, and an approved contract, to provide the flight training for Southwestern Illinois College's (SWIC) existing 141 aviation curricula. Ideal has FAA approved Private Pilot and Instrument courses, of which I am the current Chief Flight Instructor; however, without a commercial course SWIC, is unable to offer VA benefits, and the students will not be able to qualify for a restricted ATP (R-ATP) certificate via the SWIC program.

As everyone knows flight training is expensive and there is a pilot shortage. This exemption would allow students take advantage of a wider selection of financial aid opportunities and let our Veterans use the educational benefits they have earned. After completing the required college courses and pilot certificates they would be able to enter the airline industry sooner, since they would qualify for the R-ATP Certificate.

In May 2018 I was hired by Ideal Aviation as the Flight Operations Manager to help build a flight school from the ground up with a strong emphasis on safety and standardization. This year we received approval to offer Part 141 Private Pilot and Instrument courses. Ideal had a candidate selected for the Commercial Course, but he left for a position at a Part 135 operator. We quickly realized the importance of establishing a management team which is less likely to move to another position. I truly enjoy teaching and have no desire to look for another position. This exemption would not only help to offer a more affordable path to a professional career in aviation via our local community college (SWIC), but also mitigate the effects of the high pilot turn-over rate in the flight school community.

- **How your request would benefit the public as a whole...**

As our organization continues to mature and refine our internal processes and procedures, we have found that our students, as well as our organization, will not benefit from individual chief instructor pilots designated for each 14 CFR Part 141 approved course (private, instrument, commercial, instructor). After conducting an organizational structure and processes review, we've determined that our students will learn more effectively and efficiently in a safer flight training program under the direct oversight and supervision of a single Chief Instructor Pilot who has made a long-term commitment to remaining with Ideal Aviation. In addition, Ideal is actively seeking an Assistant Chief Flight instructor and will have a reduced scope of responsibility primarily focused on management of the day-to-day operations including instructor, simulator and aircraft availability, maintenance, and management.

Currently, Saint Louis University (SLU) is the only choice in our area where an individual can receive an Aviation degree and qualify for a R-ATP certificate. As an Alum, I'm very familiar with the high quality of education SLU provides; however, it is a private school which is very expensive. Southwestern Illinois College is a state funded community college aimed at providing a quality education to all demographics. It is located next to Scott Air Force Base, making it very convenient for our Veterans to utilize. Due to the lower educational cost, this exemption would allow students to enter a career in aviation which has a more affordable tuition than larger universities and uses less of a Veteran's educational benefits.

By granting this exemption, the Ideal Aviation flight training environment will enter a period of

stable consistent leadership that will facilitate a single point of contact with the FAA/FSDO and SWIC Aviation department. This will greatly improve the effectiveness, efficiency, and safety of training and operations that will translate into a higher quality student, graduate, and instructor corps at an affordable cost to the public. These graduates and instructor pilots will then become the next generation of aviation professionals leading and serving the aeronautics industry and global community after having received their initial flight instruction and aviation foundation under the comprehensive, congruent and safety focused leadership of a single chief instructor who also directly manages their entire flight training education.

- **Reasons why the exemption would not adversely affect safety, or how the exemption would provide a level of safety at least equal to the existing rule...**

The overarching purpose is to establish a long-term stable leadership that will navigate the expected rapid and frequent changeover of personnel for the next several years as many flight instructors transition to corporate and commercial flight opportunities between 1000 and 1500 total flight hours.

To better serve Ideal, SWIC, and the general aviation community. I announced my intent to remain at Ideal Aviation with no plans or aspirations of leaving.

As mentioned above, I am currently the Chief Flight Instructor over two existing FAA courses and helped to build a safe and effective flight training program. My commitment to safety is the same regardless of what certificate a student is working towards. As an Adjunct Professor in SWIC's aviation program I'm fortunate to work with several others with decades of civil and military flight experience, which I incorporated into Ideal's safety policies. We all expect our students and instructors maintain a high level of safety and professionalism throughout their training.

My familiarization of Ideal's flight program is unmatched. Most of my flight time has been instructing at Ideal in the aircraft which are approved for our 141 courses. I've led or participated in developing the course syllabi, SOP's, and current safety procedures which were approved by the St. Louis FSDO and will be the same ones used for the Commercial course if the exemption is approved.

My level of commitment to safety can be measured by some of my previous awards in aviation. I graduated from Saint Louis University - Parks College, Magna Cum Laude with a B.S. in aviation while working and helping to provide for a family. As an instructor/manger, I place a tremendous amount of importance on safety, quality, and standardized flight training. I was recognized for this in 2019 by the Greater St. Louis Flight Instructors Association, awarding me "Flight Instructor of the Year".

- **A summary we can publish in the Federal Register stating:**
- **The rule from which you seek the exemption**
- **A brief description of the exemption you seek...**

I humbly request exemption from 14 CFR 141.35 (d) (1) and no others in order that I may be permitted to serve as the Chief Flight Instructor at Ideal Aviation, administering a course of training other than those that leading to the issuance of a Commercial certificate or rating, without the required minimum of 2,000 hours PIC. No additional relief is sought, and this exemption would only apply to Mr. Moseley's serving as the Chief Instructor Pilot while serving with Ideal Aviation.

- **Any additional information, views, or arguments available to support your request**

**Additional information for your consideration:**

It is my intent to lead and manage the Ideal Aviation fixed-wing program as the existing Chief Flight Instructor of the Private and Instrument courses. I am approximately 250 hours short of the required 2,000 hours of PIC time, but I am still actively flying/instructing each month. Last year I flew 428 hours for Ideal. This exemption would allow Ideal and SWIC to move forward with the approval for a part 141 Commercial course, then on to the VA approval process, and ultimately allow students to enroll.

**Flight hours and history summary:**

At the time of this request, I have 1,834 total flight hours, with 1,749 logged as Pilot-In-Command (PIC) time, and 1,384 hours of Dual Flight Instruction provided time. Since May 2018 I've had a leadership role with Ideal Aviation and have been an Adjunct Professor at SWIC since Feb, 2019. In addition to my 141 Chief Flight Instructor certification, I hold a Certified Flight Instructor-Instrument (CFII), Multi-Engine Instructor (MEI), and Advanced Ground Instructor (AGI).

**Current ground / simulator / flight instruction:**

I currently serve as the Chief Flight Instructor and Adjunct Professor in part 141 programs. My duties are primarily focused on providing the highest quality environment, equipment, and personnel to provide the safest most effective and efficient training environment for approximately 60 students, 2 part-time, and 7 full-time certified flight instructors. In addition to providing administrative leadership and management of the school's activities, I conduct written, oral, and flight stage evaluations and provide 'fill-in' flight instruction when a flight instructor is not able to provide scheduled ground, simulator, or flight instruction. I am certified to provide flight instruction in every flight course currently offered by Ideal Aviation (both part 61 and 141).

Current students: In addition to the above mentioned I currently have 4 private students, 1 instrument student, and 2 CFI students.

**Restated Purpose:**

I humbly and respectfully request your consideration for exemption from Section 141.35 (d) (1) of the Federal Aviation Regulations (FAR). This exemption, if granted, would permit me to serve as the Chief Flight Instructor at Ideal Aviation, administering a course of training other than those that lead to the issuance of a private pilot certificate or rating, or an instrument rating or a rating with instrument privileges, without the required minimum of 2000 hours as PIC.

This request is specifically for 14 CFR 141.35 (d) (1) and no others as Mr. Moseley already is the Chief Instructor Pilot for all other courses taught at Ideal Aviation, except those contained in this section.

**Additional Contact information**

Please feel free to contact me with any questions or concerns you may have regarding this request at either my work address or my home address...both provided here:

Work:

Ideal Aviation

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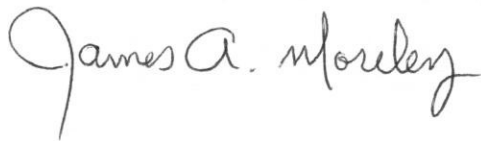
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Thank you very much for your time and consideration.

James A. Moseley 3797504CFI Exp. 2/1/2024

A handwritten signature in cursive script that reads "James A. Moseley". The signature is written in dark ink and is positioned below the typed name and contact information.